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United States District Court
Southern District of Texas
FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT
HOUSTON DIVISION

DEC - 6 2011

David J. Bradley, Clerk of Court

H-11-4216
CIVIL NO.

UNITED STATES OF AMERICA, §
ex rel. Tramell Kukoyi §

STATE OF CALIFORNIA, ex rel. §
Tramell Kukoyi; §
STATE OF COLORADO, ex rel. §
Tramell Kukoyi; §
STATE OF CONNECTICUT, ex rel. §
Tramell Kukoyi; §
STATE OF GEORGIA, ex rel. §
Tramell Kukoyi; §
STATE OF ILLINOIS, ex rel. §
Tramell Kukoyi; §
STATE OF MARYLAND, ex rel. §
Tramell Kukoyi; §
STATE OF MASSACHUSETTS, ex rel. §
Tramell Kukoyi; §
STATE OF MICHIGAN, ex rel. §
Tramell Kukoyi; §
STATE OF NORTH CAROLINA, ex rel. §
Tramell Kukoyi; §
STATE OF TENNESSEE, ex rel. §
Tramell Kukoyi; §
STATE OF TEXAS, ex rel. §
Tramell Kukoyi; §
STATE OF WISCONSIN, ex rel. §
Tramell Kukoyi; and Doe States 1 – 22, §
ex rel. Tramell Kukoyi, §

Plaintiffs, §

v. §
SavaSeniorCare, L.L.C.; §
Woodwind Lakes Health & Rehabilitation §
Center; SSC Houston Woodwind Operating §
Company, L.L.C.; SSC LP Holdings; §
SSC Houston Woodwind Operating GP, §
L.L.C.; SSC Submaster Holdings, L.L.C.; §
SSC Equity Holdings, L.L.C.; §
SavaSeniorCare Administrative Services, §
L.L.C.; SVCare Holdings, L.L.C.; Canyon §
Sudar Partners; Leonard Grunstein; Murray §

RELATOR TRAMELL KUKOYI'S
ORIGINAL COMPLAINT PURSUANT
TO 31 U.S.C. §§ 3729 – 3723
FEDERAL FALSE CLAIMS ACT
AND STATES' FALSE CLAIMS ACTS
AND PENDANT CLAIMS

FILED IN CAMERA
AND UNDER SEAL

JURY TRIAL DEMANDED

Forman; SavaSeniorCare, L.L.C.; §
Alpine Living Center; SSC Thornton §
Operating Company, L.L.C.; Alpine §
Terrace; SSC Kerrville Alpine Terrace §
Operating Company, L.P.; Anderson §
Mill Health and Rehabilitation Center; §
SSC Austell Operating Company, §
L.L.C.; Applewood Living Center; §
SSC Longmont Operating Company, §
L.L.C.; Arcola Health and Rehabilitation §
Center; SSC Fort Worth Nursing & §
Rehabilitation Center Operating Company, §
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Company, L.P.; Ashland Health and §
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Operating Company, L.L.C.; Aspen §
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Aspen Operating Company, L.L.C.; §
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L.P.; Bay Villa Health Care Center; SSC §
Bay City Operating Company, L.P.; Bel §
Air Health and Rehabilitation Center; SSC §
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SSC Kerrville Edgewater Operating
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Company, L.P.; Fairview Health and
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Operating Company, L.L.C.; Faith
Memorial Nursing Home; SSC
Pasadena Operating Company, L.P.;
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Manor; SSC Waco Greenvue
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SSC Kenesaw Operating Company, L.L.C.;
Heritage Harbour Health and Rehabilitation
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Company, L.L.C.; Heritage Manor
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Company, L.L.C.; Yuma Life Care Center; §
SSC Yuma Operating Company, L.L.C.; §
Omnicare Inc.; Transcare EMS; Intercare §
Health Services, Inc.; Igor Baranovski; and §
Olga Baranovski, §

Defendants.

RELATOR TRAMELL KUKOYI'S ORIGINAL COMPLAINT

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